

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC.; PLANNED  
PARENTHOOD LEAGUE OF  
MASSACHUSETTS; and PLANNED  
PARENTHOOD ASSOCIATION OF UTAH,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as SECRETARY OF THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; MEHMET OZ, in his official capacity as ADMINISTRATOR OF THE CENTERS FOR MEDICARE & MEDICAID SERVICES; and CENTERS FOR MEDICARE & MEDICAID SERVICES,

Defendants.

Case No. 1:25-cv-11913

**Oral Argument Requested  
Expedited Hearing Requested**

**PLAINTIFFS' EMERGENCY MOTION FOR A  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Under Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Planned Parenthood Federation of America, Inc.; Planned Parenthood League of Massachusetts; and Planned Parenthood Association of Utah move for a temporary restraining order and preliminary injunction to enjoin Defendant from enforcing Section 71113 of An Act to provide for reconciliation pursuant to title II of H. Con. Res. 14, which was effective immediately upon the date of enactment (July 4, 2025). Plaintiffs request that an injunction be granted without bond. Plaintiffs request an expedited briefing schedule, hearing, and ruling.

This Motion is based on the Complaint, the accompanying Memorandum of Law, and the declarations attached thereto.

Dated: July 7, 2025

Respectfully submitted,

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*\*Application for pro hac vice forthcoming*

*Counsel for Plaintiffs*

**LOCAL RULE 7.1 CERTIFICATE**

Pursuant to Local Rule 7.1(a) and Federal Rule of Civil Procedure 65, counsel for Plaintiffs certify that they have contacted the following individuals at the U.S. Department of Justice by electronic mail to provide notice of this motion:

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As of the time of filing, Defendants have not responded.

Dated: July 7, 2025

Respectfully submitted,

*/s/ Sharon K. Hogue*  
\_\_\_\_\_  
Sharon K. Hogue, BBO# 705510

**CERTIFICATE OF SERVICE**

Counsel for Plaintiffs certify that they have submitted the foregoing document with the clerk of court for the District of Massachusetts, using the electronic case filing system of the Court. Counsel for Plaintiffs hereby certify that they have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

Dated: July 7, 2025

*/s/ Sharon K. Hogue*

Sharon K. Hogue, BBO# 705510